

**REMARKS**

Claims 1-13 are pending. By this Response, claims 1-7 are amended. Reconsideration and allowance based on the above amendments and following remarks are respectfully requested.

Interview

Applicants appreciate the courtesies extended to applicant's representative during the interview conducted on July 13, 2005 with the Examiner and his supervisor. During the interview, applicants argued the combinability of the Britt reference and Fukasawa particularly the combining of a conversion server taught in Fukasawa with the system of Britt, which already includes a conversion device within the portals server and the lack of motivation for making such combination. The Examiner and his supervisor, were not convinced by applicant's arguments stating that motivation to combine the teaching is found on paragraph 51 of Britt.

Applicants note that the claims have been amended to clarify the recited features therein.

Prior Art Rejections

The Office Action rejects claims 1-5, 7-11 and 13 under 35 U.S.C. §103(a) as being unpatentable over Britt, Jr. (US 2002/0032785) in view of Fukasawa, et al. (US 6,738,822) and claims 6 and 12 under 35 U.S.C. §103(a) as being unpatentable over Britt, Fukasawa and applicant's admitted prior art. These rejections are respectfully traversed.

Applicants note that Britt teaches a system similar to the system described in applicant's admitted prior art in which a portal server 110 is in communication with other network servers 130. The other network servers provide the portal server with content information where, within the portal server itself, the content information is converted and formatted prior to transmission from the portal server.

Fukasawa in contrast teaches a system that provides communication between a video client and video server. A conversion server converts video data transmitted from the video servers via the network into an HTTP message and then transmits the message to the video clients. See column 4, lines 59-67 to column 5, lines 1-40. Fukasawa's conversion server, although serving the function of converting certain types of data between video server and a video client, does not perform conversion and formatting between a communication link between a content server and one or more portal servers where the converted data is stored in a memory and then the converted data is formatted in a predetermined format into displayable content information, as in the embodiments of the present invention.

Applicants respectfully submit that Britt teaches each portal server being directed to an individual conversion module. Britt does not teach or suggest a conversion module that communicates and performs conversion and formatting with respect to one or more portal servers. Further, nowhere does Britt or Fukasawa teach that their conversion modules store the converted data information in a memory and format the exchangeable contents information in the stored memory as recited in independent claim 1. Therefore, the combination of Fukasawa and Britt does not teach all the features of applicant's claimed invention.

Further, applicants respectfully submit that one of ordinary skill in the art would not combine the teachings of Fukasawa with Britt to achieve applicant's claimed invention. Britt's system is a system similar to the conventional teachings disclosed in applicant's background section for which applicant's embodiments are improvements upon in which the conversion of data is processed within each of the portal servers themselves. While Fukasawa system teaches extraneous conversion servers, Fukasawa's system is directed to an entirely different environment and type of data conversion directed towards video relay system. The Examiner has stated that motivation to combine the teachings is found in paragraph 51 of Britt. Paragraph 51 states that "it will apparent, however, to one skilled in the art that the invention may be practiced without some of these specific details. For example, while the system described above employs a single server 110, alternative embodiments of the invention may include numerous different servers (e.g. database servers, web servers, etc.), and/or mirrored servers distributed across a network." Although Britt discloses that different servers may be utilized in Britt's system, nowhere does it suggest removing the conversion modules from within the portal servers and locating these as separate servers outside of the portal servers themselves. Furthermore, neither Fukasawa teaches or suggests this feature.

Applicants respectfully submit that such a suggestion based on the two references Britt and Fukasawa can only be made by impermissible hindsight. Obviousness cannot be established by hindsight combination to produce the claimed invention. *In re Gorman*, 933 F.2d 982, 986, 18 USPQ 2d 1885, 1888 (Fed. Cir. 1991). It is the prior art itself and not the applicant's achievement that must establish the obviousness of the combination. Therefore, applicants

respectfully submit that the only motivation to make such modification to Britt in view of Fukasawa's teaching is based on impermissible hindsight reference to applicant's specification.

In view of the above, applicants respectfully submit that the combination of Britt and Fukasawa fail to teach each and every feature of the claims as required. Further, one of ordinary skill would not be motivated to combine the teachings to achieve applicant's claimed invention. Accordingly, reconsideration and withdrawal of the rejections are respectfully requested.

#### Conclusion

For at least these reasons, it is respectfully submitted that claims 1-13 are distinguishable over the cited art. Favorable consideration and prompt allowance are earnestly solicited.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Chad J. Billings (Reg. No. 48,917) at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

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If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

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